

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

**RACHAEL ANNE ELROD, ANDREW
KAUFMAN, SARAH MARTIN, and
BROOKS BRASFIELD, on behalf of
themselves and all others similarly situated,**

Plaintiffs,

v.

**NO TAX 4 NASH, MICHELLE
FOREMAN, KAREN MOORE, and JOHN
DOES 1-10,**

Defendants.

**CIVIL ACTION NO.
3:20-cv-00617**

**District Judge Richardson
Magistrate Judge Barbara D. Holmes**

**MICHELLE FOREMAN and KAREN
MOORE,**

Third-Party Plaintiffs,

v.

**BEST SELLERS, LLC, HEATHER
SELLERS, JOE GERGLEY, and
HYPERMETRICS, LLC,**

Third-Party Defendants.

MOTION FOR ADDITIONAL TIME TO FUND SETTLEMENT

Defendant Karen Moore respectfully moves the court for a ten (10) day extension of time within which to fund the settlement fund under the settlement agreement for which this court granted preliminary approval on May 25, 2022. [Dkt. 152]. This motion is not opposed. In support of her motion, Ms. Moore would show the court as follows:

1. On May 25, 2022, this court entered an order granting preliminary approval of the settlement reached in this class action case.
2. The settlement agreement approved the court calls for payments from Defendants to be made within fifteen (15) days from the date of preliminary approval. [Dkt 147-1] ¶45. That deadline would run today, June 9, 2022.
3. The large portion of the settlement (\$1,000,000 of the total settlement amount of \$1,001,050) will come from two separate insurance carriers for Ms. Moore.
4. Due to various factors, including a delay in getting instructions for payment, the two carriers have been unable to meet this deadline. However, both carriers have issued payment and the settlement checks should be delivered within one (1) week.
5. Class counsel does not oppose this request.

WHEREFORE, defendant Karen Moore respectfully requests that the court extend the deadline for all defendants to fund the settlement in this matter until Monday, June 19, 2022.

Respectfully submitted,

/s/Garry K. Grooms

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing Motion via Notice of Electronic Filing, or, if the party served does not participate in Notice of Electronic Filing, by U.S. First Class Mail on this the 9th day of June, 2022:

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